

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AJAY SURESH, Case No.: 22-cv-4349 (NRB)
:
Plaintiff,
:
-against- ANSWER
:
HKS CAPITAL PARTNERS, LLC,
:
Defendant.
----- X

Defendant for its Answer to the Complaint states, as follows:

1. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 1 of the Complaint.
2. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the Complaint.
3. Admits the truth of the allegations in paragraph 3 of the Complaint.
4. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 4 of the Complaint and denies committing misconduct.
5. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 5 of the Complaint.
6. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 6 of the Complaint.
7. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 7 of the Complaint.
8. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 8 of the Complaint.

9. Denies the truth of the allegations in paragraph 9 of the Complaint.
10. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 10 of the Complaint.
11. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 11 of the Complaint.
12. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 12 of the Complaint.
13. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 13 of the Complaint.
14. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 14 of the Complaint.
15. Denies the truth of the allegations in paragraph 15 of the Complaint.
16. Denies the truth of the allegations in paragraph 16 of the Complaint.
17. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 17 of the Complaint.
18. Denies the truth of the allegations in paragraph 18 of the Complaint.
19. Denies the truth of the allegations in paragraph 19 of the Complaint.
20. Denies the truth of the allegations in paragraph 20 of the Complaint.
21. Denies the truth of the allegations in paragraph 21 of the Complaint.
22. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 22 of the Complaint.
23. Denies the truth of the allegations in paragraph 23 of the Complaint.
24. Denies the truth of the allegations in paragraph 24 of the Complaint.

25. Denies the truth of the allegations in paragraph 25 of the Complaint.
26. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 26 of the Complaint.
27. Repeats the responses to paragraphs 1 to 26 in response to paragraph 27 of the Complaint.
28. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 28 of the Complaint.
29. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 29 of the Complaint.
30. Denies the truth of the allegations in paragraph 30 of the Complaint.
31. Denies the truth of the allegations in paragraph 31 of the Complaint.
32. Denies the truth of the allegations in paragraph 32 of the Complaint.
33. Denies the truth of the allegations in paragraph 33 of the Complaint.
34. Denies the truth of the allegations in paragraph 34 of the Complaint.
35. Repeats the responses to paragraphs 1 to 26 in response to paragraph 35 of the Complaint.
36. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 36 of the Complaint.
37. Denies the truth of the allegations in paragraph 37 of the Complaint.
38. Denies the truth of the allegations in paragraph 38 of the Complaint.
39. Denies the truth of the allegations in paragraph 39 of the Complaint.
40. Denies the truth of the allegations in paragraph 40 of the Complaint.
41. Denies the truth of the allegations in paragraph 41 of the Complaint.

FIRST AFFIRMATIVE DEFENSE

42. The Complaint fails to state a cause of action.

SECOND AFFIRMATIVE DEFENSE

43. Plaintiff is barred from relief by the statute of limitations.

THIRD AFFIRMATIVE DEFENSE

44. Defendant did not knowingly or intentionally violate a copyright.

WHEREFORE, defendant demands judgment dismissing the action and for such other relief as the Court deems just and proper.

Dated: New York, New York
November 14, 2022

FRYDMAN LLC

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